

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: WAYNE GREGORY LITTLE : CHAPTER 13  
Debtor(s) :  
 :  
 :  
 CHARLES J. DEHART, III :  
 STANDING CHAPTER 13 TRUSTEE :  
 Movant :  
 :  
 :  
 vs. :  
 :  
 :  
 WAYNE GREGORY LITTLE :  
 Respondent(s) : CASE NO. 5-20-bk-00023

TRUSTEE'S OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 8th day of June, 2020, comes Charles J. DeHart, III, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced debtor(s)' plan for the following reason(s):

1. The Trustee avers that debtor(s)' plan is not feasible based upon the following:
  - a. The plan is underfunded relative to claims to be paid – 100% plan.
  - b. Plan ambiguous – payment.

WHEREFORE, Trustee alleges and avers that debtor(s) plan is nonconfirmable and therefore Trustee prays that this Honorable Court will:

- a. Deny confirmation of debtor(s) plan.
- b. Dismiss or convert debtor(s) case.
- c. Provide such other relief as is equitable and just.

Respectfully submitted:

/s/Charles J. DeHart, III  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 22nd day of June, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Wayne Gregory Little  
110 Snowshoe Drive  
Dingmans Ferry, PA 18328

/s/Deborah A. Behney  
Office of Charles J. DeHart, III  
Standing Chapter 13 Trustee